

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Peter E. Tavani

: NO. 21-11689-MDC

: CHAPTER 13

Response to Motion for Relief filed by Plaza Home Mortgage

Debtor, by and through her attorney, responds as follows:

1-4. Admitted

5-11. Denied. All of debtor's payments have not been credited, there is equity in the property and the property is necessary for a successful plan and reorganization.

WHEREFORE, it is respectfully requested that the Motion be DENIED.

By: /S/Michael P. Kelly